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September 14, 2023

**By ECF**

Hon. Stewart D. Aaron  
United States Magistrate Judge  
500 Pearl Street, Room 1970  
New York, New York 10007  
[Aaron\\_NYSDChambers@nysd.uscourts.gov](mailto:Aaron_NYSDChambers@nysd.uscourts.gov)

Re: *Falvey Cargo Underwriting Ltd, et al.,*  
*v. ZIM Integrated Shipping Services Ltd., et al.*  
1:19-cv-11495-RA  
Our File: 6302

Dear Judge Aaron:

We represent Plaintiffs in the captioned matter and write to advise the Court that we have been in contact with counsel for Defendants Mega Shipping and Forwarding Ltd. and Meridian Line. A notice of appearance was filed on 14 September 2023 by Attorney Susan Lee, Esq., Docket Entry 74, and Plaintiffs have granted an extension to Attorney Lee for those Defendants' time to answer and to cross claim against ZIM Integrated Shipping Services, Ltd. for indemnification and contribution.

In light of the foregoing, Plaintiffs respectfully request to be relieved from the Court's order directing Plaintiffs to seek certificates of default from the Clerk of the Court by 19 September 2023. Thank you.

*Kennedy Lillis Schmidt & English*

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Hon. Stewart D. Aaron  
United States Magistrate Judge

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Respectfully,

KENNEDY LILLIS SCHMIDT & ENGLISH

By: *s/ Nathan T. Williams*  
Nathan T. Williams

Plaintiffs' Letter Motion is GRANTED. The deadline for all Defendants, including Zim Integrated Shipping Services Ltd., to respond to the Amended Complaint is extended to 10/20/2023. SO ORDERED.

Dated: 09/15/2023

*Stewart D. Aaron*